

CULLEN & DYKMAN LLP  
100 Quentin Roosevelt Boulevard  
Garden City, NY 11530  
(516) 357-3700  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
[mroseman@cullenanddykman.com](mailto:mroseman@cullenanddykman.com)  
[bpollack@cullenanddykman.com](mailto:bpollack@cullenanddykman.com)

*Counsel for the Debtor*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	:
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JOSEPH KLAYNBERG,	:
	:
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Debtor.	:
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**NOTICE OF MONTHLY FEE STATEMENT FOR DEBTOR'S SPECIAL ADVERSARY  
PROCEEDING COUNSEL  
FOR THE MONTH OF AUGUST 2022**

PLEASE TAKE NOTICE that pursuant to the Order of the Bankruptcy Court dated March 11, 2022 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the Monthly Fee Statement for Debtor's Special Adversary Proceeding and Conflicts Counsel for the month of August 2022 is attached hereto.

Dated: Garden City, New York  
September 19, 2022

CULLEN AND DYKMAN LLP  
*Counsel for Debtor*

By: s/ Bonnie Pollack  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
100 Quentin Roosevelt Boulevard  
Garden City, NY 11530  
(516) 357-3700

Joseph Klaynberg  
114 Mulberry Street  
New York, NY 10013

September 12, 2022

File #: 22-008

**Attention:**

**RE:** Josephy Klaynberg - Chapter 11 Special Counsel

DATE	ENTRY #	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-05-22	106153	Draft First Request for Production of Documents	1.30	422.50	SA
	105569	Read JPMorgan's letter filed with Court in connection with sale of RP.	0.10	32.50	SA
Aug-08-22	105575	Review of Nahla Initial Disclosures	0.20	100.00	AMT
	106154	Review of files in connection with preparation of Debtor Rule 26(a) Disclosure (0.2); confer with S. Avramidis (0.1); draft email to B. Pollack and phone call re: need copies of and description of documents in her possession and which have already been provided to Nahla (0.2).	0.50	250.00	AMT
	105589	Phone with B. Pollack and S Avramids re: discovery Rule 26 Initial Disclosures	0.50	250.00	AMT
	106131	Review and revise Plaintiff Initial Disclosures	0.40	200.00	AMT
	106155	Confer with AMT re. 26(a) disclosures (0.3); review Defendant's initial disclosures (0.2).	0.50	162.50	SA
	105610	Phonecall with Bonnie re. discovery & 26(a) disclosures.	0.50	162.50	SA
	105611	Draft 26(a) disclosures.	1.00	325.00	SA
	106156	Revise & finalize 26(a) disclosures per AMT's comments. Serve via email.	0.30	97.50	SA
Aug-10-22	106157	Revise First Request for Production of Documents.	0.30	97.50	SA
	106158	Brief review objection to approval of fees for Special Counsel (0.1). Review	0.50	0.00	SA

	objection to Disclosure Statement, including transcripts of depositions (0.4).			
Aug-11-22	105676 Review and revision of Document Production Request	0.50	250.00	AMT
Aug-17-22	106159 Court Appearance - Interim Fee Application hearing	1.60	800.00	AMT
	106132 Phone call with AMT re fee application hearing & comments made in related proceedings relevant to preference action.	0.30	90.00	SA
Aug-18-22	106160 Phone to B. Pollack Imcb	0.10	0.00	AMT
	105779 Phone with B. Pollack re: discuss yesterday's court hearing on various matters before the court	0.20	100.00	AMT
	105782 Review motion for Operating Trustee	0.40	200.00	AMT
	106161 Email from and to B. Pollack re: counsel fees	0.10	0.00	AMT
Aug-25-22	106162 Search files for life insurance policy and information	0.30	0.00	AMT
	106163 Further research into Northwest Insurance issue/question of B. Pollack	2.70	0.00	AMT
	106164 Phone with B. Pollack re: Northwest Insurance	0.20	0.00	AMT
	Totals	12.50	<u>\$3,540.00</u>	